

REMARKS

The Official Action mailed November 21, 2006, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on January 14, 2004; May 11, 2004; February 24, 2005; and September 25, 2006.

Claims 1-20 and 46-59 are pending in the present application, of which claims 1-4 are independent. Independent claims 1-4 have been amended to better recite the features of the present invention, and dependent claims 48-59 have been amended to correct a minor typographical informality. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action rejects claims 1-20 and 46-55 as obvious based on the combination of U.S. Patent Application Publication No. 2002/0085143 to Kim, U.S. Patent No. 5,298,768 to Okazaki and U.S. Patent Application Publication No. 2001/0040645 to Yamazaki, either alone or in combination with one of the following: U.S. Patent No. 4,648,691 to Oguchi, U.S. Patent Application Publication No. 2002/0041348 to Yokoyama, U.S. Patent Application Publication No. 2002/0130985 to Weindorf, U.S. Patent No. 6,331,381 to Chaudhari, U.S. Patent No. 5,781,263 to Kawagoe, U.S. Patent No. 4,202,607 to Washizuka and U.S. Patent No. 4,536,014 to Boutaleb. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available

to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 1-4 have been amended to recite that a first plastic substrate is larger than a second substrate, which is supported in the present specification, for example, by Figures 1C, 1D, 2C, 2D, 6, 8A, 8B, 9A, 9B, 10, 11A, 11B and 13C. For the reasons provided below, Kim, Okazaki and Yamazaki '645, either alone or in combination with one or more of Oguchi, Yokoyama, Weindorf, Chaudhari, Kawagoe, Washizuka and Boutaleb do not teach or suggest the above-referenced features of the present invention.

Kim does not appear to teach first and second plastic substrates with a semiconductor device and a liquid crystal cell interposed therebetween. The Official Action regards protective layer 207 of Kim as the first substrate of the present claims, although it appears that Kim does not teach or suggest that the protective layer 207 is plastic.

The Official Action asserts that "Okazaki et al.'s backlight would replace the light emitting layer (204) of Kim" (page 3, Paper No. 20061114). The Applicant disagrees

and traverses the assertions in the Official Action. Kim teaches that an “organic light emitting diode (OLED) comprises a cathode layer, an organic film layer, and an anode layer” (paragraph [0007]). The Official Action has not shown why one of ordinary skill in the art should have used Okazaki’s backlight to replace Kim’s organic film layer 204 of an organic light emitting diode comprising an anode 203, the organic film layer 204 and a cathode 205.

Also, Kim appears to teach that an organic light emitting diode (an anode 203, an organic film layer 204 and a cathode 205) is formed over a surface of a first substrate 201a. After the organic light emitting diode (203/204/205) is formed, a thin film transistor 208 is formed over the first substrate 201a (Figure 2). That is, the light-emitting device is not formed over the first substrate 201a. Kim does not teach or suggest that a thin film transistor and a liquid crystal are attached to a first plastic substrate over which the light-emitting device and a resin are formed.

Further, the claims recite an insulating film formed over an adhesive, which is formed over a resin. That is, the insulating film is formed over the resin. The Official Action relies on first insulating layer 202 to teach the insulating film of the present claims and on the first substrate 201a to teach the resin of the present claims. However, in Kim, the insulating film (first insulating layer 202) is formed under, not over, the resin (first substrate 201a). The Official Action has not explained why one of ordinary skill in the art at the time of the present invention should have formed the first insulating layer 202 of Kim over the first substrate 201a. The Official Action has not demonstrated how the other prior art references of record teach or suggest such modification to Kim.

In any event, even if the Official Action were able to demonstrate sufficient motivation to replace Kim’s organic light emitting diode with Okazaki’s LED chip 1, block bodies 4 and resin, the Official Action does not explain a size relationship between the size of Kim’s second substrate 201b and Okazaki’s block bodies. The Official Action does not demonstrate how Kim’s second substrate 201b could work as an opposed substrate for a display portion that hypothetically comprises Okazaki’s LED chip 1, block

bodies 4 and resin. Also, Okazaki does not clearly show the size of the block bodies. Rather, Okazaki discloses that "the resulting chip LED does not meet demand for smaller and thinner chip LEDs" (column 2, line 18-19). As such, it does not appear that the block bodies of Okazaki are larger than the display portion. Therefore, the Applicant respectfully submits that the added feature that a first plastic substrate is larger than a second substrate could not be obtained even if Kim and Okazaki are combined.

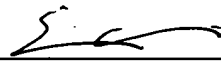
Yamazaki '645, Oguchi, Yokohama, Weindorf, Chaudhari, Kawagoe, Washizuka and Boutaleb do not cure the above-referenced deficiencies in Kim and Okazaki.

Therefore, the Applicant respectfully submits that Kim, Okazaki and Yamazaki '645, either alone or in combination with one or more of Oguchi, Yokoyama, Weindorf, Chaudhari, Kawagoe, Washizuka and Boutaleb do not teach or suggest that a first plastic substrate is larger than a second substrate.

Since Kim, Okazaki and Yamazaki '645, either alone or in combination with one or more of Oguchi, Yokoyama, Weindorf, Chaudhari, Kawagoe, Washizuka and Boutaleb do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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